

Fuel Service Stations and Ancillary Development

Submissions – 2nd Public Consultation
16-04-14 to 06-06-2014

Ref no	Name	Summary	Reply
FSSP/2014/001-2	Perit Tancred Mifsud Clients details: Emanuel Falzon Joem Autoparts, B'Kara Road, St. Julians,	<p>Comments on relocation of fuel stations:</p> <p>The draft policy limits relocation of existing fuel stations that are within development zones and excludes the possibility of relocation of any fuel stations that are in ODZ.</p> <p>My client is the owner of three fuel stations, one of which is PS 56 (located on the University grounds Msida, having access onto Regional Road). This particular site is located ODZ and if the draft policy is applied, this fuel station does not qualify for relocation. I would like MEPA to consider the history of this fuel station. PS56 (covered by MEPA permit PA 2972/96) was originally within scheme and the government had relocated the fuel station when upgrading the university roundabout junction. The site on which the fuel station was relocated is owned by the University of Malta, is located ODZ and in accordance with current local plan policies, is surrounded with an area zoned for "Public Open Space as per NHRL 01. This does not make sense that a fuel station is located abutting a public open space and due consideration to any possible relocation merits consideration for the benefit of all sides.</p> <p>We are requesting the MEPA to consider the relocation of this fuel station since University of Malta informed my client that the University requires the land for upgrading of</p>	<p>The policy contemplates specific situations where fuel stations may be located in ODZ. The more environmentally sensitive areas are excluded a priori and there is specific guidance and safeguards intended to avoid unacceptable environmental impact.</p> <p>This case is an isolated case and may need to be addressed on its own particular merits.</p>

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		<p>university grounds. It would not be good planning to develop the surrounding site for ancillary use of university and abutting with a fuel station, since the fuel station is a hazard and not compatible with adjacent uses not compatible with fuel stations. We think that the current site merits consideration for relocation since the existing fuel station is not ideally located in terms of proximity with residential development/ scheme, vehicle access to and from station to arterial road and any possible development that the university might consider on its land to improve service to students and other university requirements.</p> <p>Another comment we like to register is the ancillary facilities/ activities provided with a RFS. MEPA is limiting the site office/ amenity to only 50 sq.mts. This limited area is not sufficient in today's world of automation since a substantial area is required for the operation of the fuel station including ATM's, CCTV's monitoring of fuel tanks, fire alarm and hydrant systemsWe agree on the principle that no services or repairs to vehicles is allowed in RFS, but sales of essentials related to the operation of vehicles must be considered with RFS, including top up oils, fuel treatment additives, car care products and other related sales. MEPA should also consider development of ancillary facilities below road level, so the space of 50sq.mts above road level will be complemented with space below road level, which development would be located below any proposed committed footprint, thus using land in an efficient way, and keeping with policy document. We accept limitations that any development below road level should not be visible from any part of the street and should be totally below pavement level.</p>	<p>Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy</p>

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		<p>Car wash facilities are not being considered with RFS. We would like to point out that carwash facility are today considered an integral part of a fuel station. Once the land for relocation is being committed, one should allow for such activities, taking into consideration the surrounding environment and taking any measures to mitigate the proposal from any visual impact. The ideal location for car washes is within fuel stations, as their location is not considered compatible within scheme or within areas of containment, since land use would not be utilized to the full potential in these areas. MEPA can impose the scale of any proposed car washes when considering RFS and limit their scale but integrate the service with that of the fuel station.</p>	<p>Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy</p>
<p>FSSP/2014/002-2</p>	<p>Peter Murray (I.D. 312198 M) ptmurray@go.net .mt</p>	<p>I noted with some concern an outstanding omission of a serious and immensely apposite consideration regarding what MEPA's policy framework 'addresses' for both new and existing fuel service stations and one which fails to provide any 'guidance' on, or at least none promulgated.</p> <p>As the wording refers to 'less desirable areas' in which fuel stations are currently sited (or about to be) not being constrained to be relocated without elaborating or qualifying on what exactly 'less desirable' means or entails. As is it 'desirable' to have such fuel stations currently occupying sites in build-up, high density traffic flow, closely and heavily populated locations as is the case in many areas -e.g. Mosta's Constitution Street being just one prime example of many similar clearly undesirable -read inappropriately unsafe -sites for fuel stations?</p>	<p>The Policy refers to requiring input from Regulators which are not directly related to land-use planning. The list of relevant consultees is indicated in the policy. From an operational point of view, there are EU Directives that guide a number of operational matters and it is understood that fuel stations that are not yet compliant are applying to upgrade their operations to this effect.</p> <p>It was made clear from the outset that this policy was not intended to forcibly relocate anyone but only to present a policy to guide new fuel stations and this included the relocation of existing fuel stations. In the latter case, should the site prove to qualify as an RFS, then its options are contemplated to be wider in terms of site selection so that the likelihood of voluntary relocation increases.</p>

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		<p>The outstanding omission, in case you haven't yet guessed it, being the safety and health of people living and working virtually on top of these fuel stations, or passing by in very close proximity in large numbers on a 365/24/7 basis, and that's a consideration worthy of 'guidance' and any 'planning' policy parameters and environmental issues, moreover, demonstrable and responsible action, I would suggest!</p>	<p>Section 8.9 has been added to include consultation with the Environmental Health Department. Other health and safety issues are addressed in Section 9. To further address this issue, in Section 4.3 (b) x), the distance has been increased from 200m to 500m. It is also important to note that the proximity of a fuel station's location to residences is only one parameter that may have a bearing on the acceptability or otherwise of location. Much depends on operational arrangements and design. Indeed experience from abroad suggests that fuel stations can be located next to or within hotels or prestigious residential areas without great difficulty.</p>
<p>FSSP/2014/003-2</p>	<p>Mario Desira mdmars@go.net. mt</p>	<p>Environmental concerns are intimately tied to the fact these islands are overpopulated. Regarding fuel stations, this is no exception and even present fuel stations operators seem to agree no more new permits need be issued.</p> <p>While agreeing with the policy, it is suggested that:</p> <ul style="list-style-type: none"> a) Incentives (tax rebates, concessions, soft loans etc, application fast tracking etc) are to be given to those operators who intend to move to non-urban locations. b) Disincentives (higher tax, commercial rate loans, very stringent almost draconian safety measures etc) for those who intend to stay operating in urban locations. Basically one is allowed to make money while potentially endangering nearby residents – this may have been allowed in the past, but expanded environmental awareness today dictate otherwise. 	<p>Registered agreement noted and appreciated.</p> <p>This is an administrative matter that would need to be determined outside the planning policy context. Forwarded to the relevant authorities.</p> <p>Again an administrative matter. As far as the environment is concerned, fuel stations are applying to upgrade in order to satisfy EU operational standards. In other countries fuel stations operate within prestigious hotels. This suggests that operational matters feature a lot on issues of compatibility with adjacent uses. Other mitigation measures may also be contemplated to reduce hazards.</p>

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		<p>c) Electrical charging or battery exchange services may be considered for stations operating in urban areas.</p> <p>d) Finally, all areas are potentially agricultural, thus there should be a tight maximum surface area allowed for ODZ applications.</p>	<p>This is contemplated by the revised policy.</p> <p>There is direction on containment and unnecessary sprawl when locating ODZ so in a way the requested containment is contemplated. Experience with other policies suggests it may be counterproductive to stipulate a quafified overall area which does not cater for the specificities of each individual site. An area limitation is placed on facilities located ODZ (see Section 3.2)</p>
<p>FSSP/2014/004-2</p>	<p>Perit Ruben Sciortino RS Design Assoc.</p>	<p>Policy 3.2 should include sites directly accessible from roads that carry heavy traffic such as a road with more than 700 cars per hour.</p> <p>Policy 3.2 (second paragraph) states: "On such sites, facilities which complement fuel stations in terms of economic sustainability of the fuel station would be encouraged...." It is our opinion that examples should be given to clarify what facilities are acceptable e.g.: Offices, Class 6, Car wash, Mechanics, Car Dealers, Class 4 and maybe also residences.</p> <p>Policy 4.3b x) reads: "A site whose boundaries are closer than 15m away or more than 200 m from the nearest Development Zone boundary". It is our opinion that the</p>	<p>Accessibility retained as per draft policy but applicability distance increased from 200m to 500m. in para 4.3 (b) x). Moreover pinning locational criteria on dynamic parameters may lead to interpretation issues.</p> <p>Section 3.2 has been amended for added flexibility.</p> <p>The 15m limit is based on technical operational grounds. Moreover, if one of the objectives is not to have new fuel stations adjacent to residential areas,</p>

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		<p>15m limit should be brought down to 10m.</p> <p>Policy 4.3 last paragraph reads: "...the uses and activities within the site will be strictly limited to those related to the sale of fuel. Proposals which include a car-wash; repair of vehicles or their accessories (e.g. mechanics, panel beaters, etc.) will not be allowed on site unless these already exist at the fuel station to be relocated and subject that these are removed from the original site and included in the planning obligation to re-locate..." It is our opinion that this policy is too restricting and thus the applicant will not be interested in the relocation. It is imperative that if the site is chosen, the owner of the fuel station can invest in different activities related to the fuel station and not just limit himself to the sale of Fuel. If the case would be that the relocated fuel station can only sell fuel, there will be no relocation applications.</p>	<p>the suggestion to locate fuel stations closer to residences goes against one of the policy objectives.</p> <p>Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy</p>
FSSP/2014/005-2	Chris Cini Go Fuels	<ol style="list-style-type: none"> Distance for the relocation of existent kerb side pumps from city centres to be extended to 500m, the suggested 200m is too close and still can create traffic problems when entering some of Malta and Gozo's urban city development zone. Relocation of an existing petrol station may have a car wash since this will not create any development besides the required equipment to operate. The policy discriminates with approved permits given in the last 5 years which granted a garage, restaurants and car wash to a relocation of a kerbside pump. 	<ol style="list-style-type: none"> Distance from Development Zone Boundary increased from 200m to 500m. in para 4.3 (b) x). Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy

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		<p>3. Sites for RFS or NUFS distance from groundwater source to be lowered to 100metres. Modern fuels station design as well as current MRA standards such as double wall pipe lines, double wall storage tanks and waterproof cess pits, already cater for the prevention of any leakages which might seep into the ground water source; being 5 metres or 300 meters will not make any difference. Once again this provision is discriminating with owners who would like to relocate under this new policy since MEPA already approved relocations which are literally next door to a bore hole, erected on agricultural land well outside the development zone. Such examples are Ta buqana station in Rabat, Malta and the new station to be constructed outside Mgarr, Malta.</p>	<p>3. The 300 m distance was established upon guidance from technical expertise with awareness of the facilities available to mitigate leakages and seepages</p>
<p>FSSP/2014/006-2</p>	<p>Perit Stephen Farrugia obo Mr. Vincent Bonnici</p>	<p>On behalf of Messrs Bonnici and with reference to pending application PA 2335/07</p> <p>As a general comment lodged applications with MEPA which have been stalled in lieu of the emerging policy since 2007 should be dealt with differently as the proposal reflected the client's wish at that point and it is deemed unfair to change radically the same proposal as this stage. However, it is felt that our application falls generally with the emerging policy scenario.</p> <p>The current proposal in PA 2335/07 includes a car wash, and it is felt that the exclusion of a carwash as an ancillary use to the petrol station as proposed by the emerging policy is not based on any reasoned planning justification other than potential visual impact. In the current proposal the carwash is situated within the envelope of an architectural canopy and thus will have minimal or no visual impact.</p>	<p>It is understood that most of the proposals have been stalled in view of their being proposed ODZ and the lack of a comprehensive policy on the subject. Actually a number of them opted to suspend processing till the enactment of this policy.</p> <p>Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy</p>

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		<p>The emerging policy caps the transferrable retail area up to 50 sqms. The current application proposes circa 180sqm (including shop, garage, office and sanitary facilities) as a built up area and this is deemed necessary for the viability of the project. Keeping in mind that my client operates from licensed retail area related to the kerbside pump with a floorspace in excess of 180 sqm, it is suggested that the policy be revised so as to regulate the potential new built up area to the area that is being transferred but not exceeding 200 sqm.</p> <p>With regards to basement level, it is felt that there should be no limitations on the size except under the landscaped areas and in respect of safety distances from fuel storage.</p> <p>It is felt that nozzle numbers should not be capped but related to site configuration and internal traffic and car maneuvering limitation and if anything the number should be a factor of 6.</p>	<p>Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy</p> <p>Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy</p>
FSSP/2014/007-2	Rebecca Grech (University Student)	<p>Jiena Studenta Universitarja fil-Kors tal-Periti (B.Sc. in Built Environment Studies) u jinteressani hafna s-settur tat-Toroq, l-manigjar tat-Transport u Infrastruttura. Ghalhekk nixtieq nissottometti xi punti rigward il-policy l-gdida dwar il-Fuel Stations, mill-perspettiva tieghi bhala studenta fejn qed nipprova napplika dak li qed nigu mghallma.</p> <ol style="list-style-type: none"> 1. Fuel Stations godda ghandhom ikunu allokati f'toroq arterjali, idealment f' By-Passes. 2. Fuel Stations ghandhom ikunu f'diztanza ta' sa 600 metru 'l boghod mill-iskema tal-bini. Dan ghalix id-distanza ta' 200 metru kif propost hija qasira wisq meta jigi kkunsidrat il-fatt li fil-futur jistghu jinhargu aktar 	<ol style="list-style-type: none"> 1. Is-Sezzjoni 5.2 hija kompatibbli ma dan is-suggeriment 2. Id -distanza mit-tarf tal-iskema ta' l-Izvilupp giet mibdula minn 200m ghal 500 m. fis-Sezzjoni 4.3 (b) x).

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		<p>permessi għall-zvilupp ta' bini, bejn l-iskema ezistenti u Fuel Stations proposti. Kull applikazzjoni għandha tigi ikkunsidrata fuq bazi individwali.</p> <p>3. Pompi tal-petrol ezistenti f'zoni abitabbli u li għandhom bzonn ikunu ristrutturati, għandhom jinghatalhom dan id-dritt, dejjem jekk jigu approvati mill-awtoritajiet koncernati bħal Transport Malta u Malta Resources Authority. Izda, meta persuna jiddeciedi li jmur 'il barra miz-zona abitabbli, irrelevanti liema awtorizzazzjoni (licenzja) għandu; jekk hux Kerb Side Pumps jew l-Awtorizzazzjoni l-Gdida mahruġa mill-MRA - Legiżlazzjoni Sussidjarja 423.37 (Avviz Legali 53/2010), l-art proposta biex fuqha ssir Fuel Station għandha tkun l-aktar haga importanti, u jigu kkunsidrati l-punti kollha proposti fill-Policy li qieghda tigi diskussa.</p> <p>Ikkwotati hawn taht:</p> <ul style="list-style-type: none"> a) Designated Industrial Areas b) Small and Medium Enterprise Sites c) Areas of Containment d) Open Storage sites as identified in the Open Storage policy e) Other areas designated for development in a subsidiary plan for: <ul style="list-style-type: none"> (i) non-residential development; or (ii) planning designation or existing uses which do not contemplate a Social and Community facility or function; and where in both cases MRA, CPD and TM deem it would be safe to locate a fuel station. f) Sites already occupied by fuel stations 	<p>3. Il-Policy mhix intenzjonata li taqla lil xi operatur tal-pompi tal-fjuwil minn postu. Fil-fatt il-MEPA rceviet numru gmielu ta' applikazzjonijiet biex pompi ezistenti isirilhom tigidid biex jottemporaw ruhhom mar-regolamenti tal-MRA.</p>

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		<p>N.B: L-aktar importanti ghandha tkun l-art proposta u mhux liema tip hi l- licenzja.</p> <p>4. Rigward id-disinn ta' Fuel Stations godda, ghandu jigi kkunsidrat spazju adegwat li jaghti cans lill-vetturi li ser jaghmlu uzu mill-Fuel Stations sabiex inaqqsu mill-velocita minghajr ma jostakolaw jew jimblukkaw il-karregjati principali. Ghalhekk ghandhom ikunu proposti li jsiru Slip Roads.</p> <p>5. Fuel Stations godda ghandhom ikollhom ukoll Discharge Zone li toffri spazju kbir bizzzejjed ghall-Petrol Bowser li jhott il-fuels fl-istess hin li vetturi ohra jkunu qeghdin juzaw is-servizz tal-Fuel Station. Din id-Discharge Zone hija utli ukoll sabiex jigi evitat ostaklu zejzed ghall-fuq it-triq.</p> <p>6. Il-'Forecourt' tal-Fuel Stations ghandu jkun separat mill-karregjata tat-traffiku permezz ta' planters jew bankina li joffru sigurta' lill-nies li jghaddu minn quddiem il-Pompa bil-mixi.</p>	<p>Il-policy ma tidholx fuq liema tip ta' licenzja tal-MRA tkun qed tigi ikkunsidrata.</p> <p>4. Dan il-punt hu indirizzat f'sezzjonijiet 5, 6 u 7 tal-policy.</p> <p>5. Fig 8 tal-policy jikkontempla din it-tip ta' sittwazzjoni.</p> <p>6. Is-sezzjonijiet 6.2 u 6.3 jikkontemplaw din is-sitwazzjoni</p>
FSSP/2014/008-2	Rabat Gozo Local Council	<p>Victoria Local Council residents wish that the fuel station found in Savina Square is relocated to another site preferably in the outskirts. This relocation will satisfy the criteria envisaged in 2.0 Fuel Stations in Malta and Gozo point 2.2 a-d. The said fuel station is situated in Victoria within the urban conservation area and the primary town centre, there are parking problems and the said area suffers from traffic congestion. The station is also a concern for public safety as it is a frequented area and there is also a bus station next to it. Moreover during the festa week of Santa Marija, the said square is the site for extensive fireworks (cigcifogu). The said location is also hard to be upgraded by MRA standards as the fuel tank is located in a public square and an archaeological area</p>	<p>Noted. No reactions that criticise the draft policy document or propose policy amendments have been noted. It is not the intention of MEPA to comment on the applicability or otherwise of the policy to specific cases</p>

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		and the Council will surely object to further development.	
FSSP/2014/009-2	Ing.Ryan Fava Engineering Consultancy	<ol style="list-style-type: none"> 1. The distance of a relocated fuel filling station from residential should be increased more than 200 metres as mentioned within the draft policy. I suggest that this will be in the region of 400 metres. One has to keep in mind that the number of fuel stored on site will be in the region of 240,000 – 300,000 litres. 2. The distance of 200 metres from residential shall be excluded if site is going to be located adjacent or opposite to an industrial area. 3. Importance will be given to sites that used to be a quarry in the past. Such sites can be reported as these will be fit for such application. 4. The number of nozzles shall be considered following the fact that in today's technology we have dispensers that can have up to 8 nozzles each. Hence minimum number of dispensers on station will be 4 i.e total number of nozzles shall be 32. In this case there will be nozzles for the promotion of alternative fuel such as BIO-ETBE, BIO-DIESEL, LPG and Electric (possibly). On the other hand taking the minimum amount usually 6 nozzles per dispenser this will give 24 nozzles on station. 	<ol style="list-style-type: none"> 1. Distance in Section 4.3 (b) x). has been increased from 200m to 500m. from the Development Zone. 2. The distances contemplated when measures from residential areas are also applicable to industrial areas. 3. These are mentioned in Section 4.1 4. Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy

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		<p>5. Permit for relocation of fuel stations will include sites with main or arterial roads exceeding 600 cars per hour. This will give the possibility that fuel stations in such busy roads will give the respective service to the clients using that particular street. Hence the conditions for containment sites will follow.</p> <p>I trust that thanks to the new MEPA policy for the development of fuel service stations, we can finally find the necessary and adequate criteria to identify the designated locations and relocate our active authorizations to functional forecourts which will be in line to the new policies.</p>	<p>5. The provisions of Section 5.2 are generally in line with this submission.</p> <p>Comment appreciated.</p>
FSSP/2014/010-2	Roderick Bajada	<p>Reference is made to the Fuel Service Stations - Public Consultation Document which was in my opinion well researched and detailed. I would like to thank you for the consultation meeting held on Tuesday 20th May 2014 at the MEPA Boardroom, which ran through the main salient points of the document. The opportunity to ask questions for certain clarifications to be made helped me understand better certain aspects of the policy. It is very clear that the current position is an inheritance of a retail network, that served its purpose over sixty years ago, and fuel stations which have in recent years been granted a permit to operate in order to try and balance the redistribution of the retail network and modernisation of the industry. It is also very clear that there is a very large discrepancy between the older fuel station retail sites and the newer ones, in terms of standards, customer satisfaction, safety and efficiencies.</p> <p>It is worth noting that a considerable number of studies have been carried out over the years and their conclusion invariably point towards liberalisation of this sector of the economy leading to the opening of new fuel stations,</p>	<p>Remarks appreciated.</p> <p>The liberalisation of the market in this sector was taken into account.</p>

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		<p>thereby investing in latest technology and allowing market forces to balance out the number and location of the same fuel stations. It is also equally worth noting that at some point in the future, as the barriers of fuel importation and distribution cease to exist, the removal of a monopoly in this sector will give way to, and allow for, branding and investment on a continuous basis. This in turn should develop a competitive market in terms of pricing, fuel quality and service that would ultimately benefit the customer. The process of fuel liberalisation within this retail sector has been a long journey and has still got a considerable way to go until significant progress is made and Malta reaches an equivalent market segment to that of other European countries. It is in Malta's interest that the fuel retail sector does not continue to breach a number of European Union directives, regulations and obligations, for which Malta has committed to in its pre-accession negotiations, particularly in freedom of trade and competition.</p> <p>Having gone through the policy document, we would like to make the following observations and suggestions:</p> <ul style="list-style-type: none"> • Direction of the Policy is supposed to have an even playing field • Distinction between existing curb side fuel stations inside towns and villages with the intention of relocation and new applications outside village 	<ul style="list-style-type: none"> • Policy has deliberately introduced the two channel approach to facilitate without forcing operators to relocate. Other players have at least 10 other relocation options to resort to. MEPA's main responsibility is towards planning policy coupled with safeguarding natural and cultural heritage and this balance is reflected in the policy. • The policy does not indicate any relocation distinction between kerbside and other stations as far as relocation is concerned. Refer to the

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		<p>centres.</p> <ul style="list-style-type: none"> • Further parameters and guidelines restrict applications by way of environmental considerations and distance from dwellings and other fuel stations. These parameters need to be relaxed particularly so when balancing the benefits of a reduction against the sacrifice of minimal agricultural land or land that may be effected by current environmental policies. Mitigation for such a sacrifice is a viable option which should be seriously considered. • The policy remains unclear with regards to vehicle access on two way carriage roads. Given the short distances in Malta coupled with the number of fuel stations available to consumers, and taking into consideration traffic management and safety, it should be a priority for MEPA to establish that retail sites should only service consumers of incoming traffic from one direction especially in main artery roads. • It is commendable that the policy establishes that fuel stations, whether new or relocated, shall include at least one nozzle for the sale of biofuels and one charging point for electric vehicles. Since the introduction of LPG in fuel stations, a number of vehicle owners have decided to go for this environmental friendly alternative to fuel and I would therefore recommend that the policy should go a step further and include also at least one nozzle for the sale of LPG. 	<p>definition of an RFS in TABLE 1., Section 2 and Section 4.2.</p> <ul style="list-style-type: none"> • Most of the environmental restrictions are mainly applicable for 5 of the 13 location possibilities referred to in the policy document. This is judged to be a reasonable balance. • Refer to Sections 5 to 7. • Noted.

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		<ul style="list-style-type: none"> • All new and relocated fuel stations should be encouraged to be self sufficient, as much as possible, in energy supplies by the use of solar energy. This will also contribute towards Malta reaching its 2020 energy targets as established by the European Union. I would recommend that the policy should include a clause stating that applications for new or relocated fuel stations having plans for the use of alternative energy as their main source of energy supply will be given preference. • It has always been a bone of contention when it comes to use of land for development purposes. One understands that land in Malta is scarce, and it is therefore my opinion that as much as possible, new or relocated fuel stations should have certain services below street level thus reducing the need to build on a wider scale. • A clearer distinction in the layout of new and relocated stations should also be made so that the fuelling of commercial/heavy vehicles and passenger vehicles does not create confusion on the retail site and allows better flow of services. • The minimum and maximum distances should be reviewed especially the ones indicating where the next petrol station should be. Distances tend to create and promote territorial monopoly and stiffen competition to the detriment of the consumer. 	<ul style="list-style-type: none"> • These considerations have been addressed are indicated in Section 8 • The possibility is contemplated. Indeed visual mitigation measures are included in Sections 3,4,5 and 8. • The proposed internal layouts are only intended as a guidance and are mainly applicable to new or upgraded fuel stations. • Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy.

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FSSP/2014/011-2	Keith Chetcuti	I would like that the government would add that no fuel station at any argument would give the permits or let a fuel station to open near a school at least more then 500 meters from it because i know that the fuel stations they want to remove them from residential areas but we dont want them to be added were our children spend 10 hours a day for half of ther life every one knows that at a very small age the fuel can harm a lot to the lungs of our children so please in this draft of fuel stations don't let them make the mistakes that others before did please make sure that no petrol station will open near any school.	As an additional safeguard, a proviso is being introduced in Section 8.9 to consult with the Environmental Health Department in the case of applications related to fuel stations.
FSSP/2014/012-2	Alex u Raymond (ahwa) Sammut	<p>Qieghdin niktbulkom b'referenza ghall-process ta' konsultazzjoni imnedi mill-MEPA rigward il-Policy il-gdida ghall-Pompi tal-Petrol. Nigbdulkom l-attenzjoni ghas-segwenti suggerimenti u nitlobbukom sabiex taghtu d-debita kunsiderazzjoni lill-istess in vista tal-Policy surreferita. F'dan ir-rigward ukoll u in vista tac-cirkostanzi pjuttost urgenti u partikulari tal-kaz taghna nitlobbukom sabiex oltre li tikkunsidraw dak li jinghad hawn taht tiffissaw appuntament maghna a konvenjenza taghkom bil-ghan illi niddiskutu s-suggerimenti taghna f'aktar dettall.</p> <p>Fl-ewwel lok naghmlu referenza ghall-proposta numru 8 maghmulha mill-GRTU u cioe' li dawk il-pompi li ilhom dormant ghal izjed minn sentejn ghandhom jispiccalhom il-permess darba ghal dejjem. Da parti taghna assolutament ma naqblux ma' din il-proposta u dan ghaliex jekk din il-proposta tigi implementata tkun qed issir ingustizzja kbira fil-konfront ta' dawk l-operaturi li mhux qed joperaw il-pompi taghhom mhux ghax ma jridux imma ghaliex ic-cirkostanzi wassluhom li ma jistghux jibaghu joperaw il-pompa taghhom jew jaghmlu uzu mil-licenzja relattiva.</p>	<p>Kienet saret laqgħa dwar dan il-kaz nhar l-4 ta' Gunju 2014.</p> <p>Dan il-punt huwa wiehed amministrattiv u l-ahjar li jigi diskuss f'fora ohrajn.</p>

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		<p>Fil-kaz taghna, rigwardanti il-pompa tal-petrol li kienet tinsab f' Bieb il-Belt, wara li l-Gvern iddemolixxa l-pompa sabiex jaghmel spazju ghall-progett ta' Bieb il-Belt minghajr ma offra l-ebda kumpens u minghajr ma offrlna l-ebda sit alternattiv, ahna gejna f' sitwazzjoni li ma nistghux noperaw proprju ghaliex m'hemmx siti individwati ghall-uzu bhala pompi. Tkun saret ingustizzja assurda maghna jekk, wara li ilna nistennew il-hrug ta' din il-'policy' sabiex nkunu nistghu nergaw nibdew noperaw, issa il-permess ikun jista' jigi terminat ghax 'dormant' ghal izjed minn sentejn – minghajr ma ssir investigazzjoni ta' x'wassal li tali permess ikun 'dormant' u/jew tal-kumpens dovut lill-operatur f' dak il-kaz. Hemm aspetti legali wkoll x'jigu ikkunsidrati f' dan ir-rigward koncernanti drittijiet fundamentali u wkoll drittijiet vestiti. Huwa ghal kollox ingust oltre illegali illi ahna nigu li nitilfu d-drittijiet taghna fuq il-licenzja minna mhallsa u mgedda regolarment semplicement ghaliex ahna ma stajniex naghmlu uzu minn din l-istess licenzja intortament. Kien ikun differenti kieku din il-kundizzjoni tigi reza applikabbli fir-rigward ta' licenzji prospettivi imma certament li dan ma jstax iregi fil-konfront ta' licenzji regolarment imgedda u li qatt ma kienu soggetti ghal xi tip ta' kundizzjoni f' dan is-sens meta nharrget tali licenzja. Ghalhekk jinghad li f'kaz li din il-kundizzjoni tigi inkluzja fil-'policy' din il-kundizzjoni tkun effettivament qed tikser drittijiet fundamentali taghna fir-rigward tal-licenzja taghna li b'hekk tigi reza minghajr ebda valur oltre milli jigu miksurin id-drittijiet vestiti taghna fl-istess licenzja. Ninnotaw wkoll li f' dan il-kaz jehtieg illi l-partijiet koncernati jiccaraw il-posizzjoni taghhom f' dan ir-rigward sabiex ma ssirx ingustizzja akbar fil-konfront taghna u ta' operatori ohrain li jstghu jghaddu mill-istess problema bhal taghna fejn, kif inghad, il-licenzja-ghalkemm regolarment imhallsa u mgedda - ma tkunx tista' tigi uzata minghajr ebda tort tal-operatur. Nixtiequ nigbdulkom ukoll l-attenzjoni ghall-fatt li skond l-</p>	<p>Mhux l-iskop ta' din il-policy li tidhol f' kazijiet specifici.</p>

Ref no	Name	Summary	Reply
		<p>imsemmija 'policy paper' jinghad li ghandhom jinsabu siti tajbin sabiex fihom ikunu jistghu jinbnew pompi godda u f'dan ir-rigward paragrafu 3.2 isemmi, fost ohrain:</p> <ol style="list-style-type: none"> a. Designated Industrial Area b. Small and Medium Enterprise Sites c. Areas of Containment d. Open Storage sites identified in the Open Storage policy e. Other areas designated for development in a subsidiary plan f. Sites already occupied by fuel stations <p>Jinghad ukoll li "sites designated as Residential Areas or Residential Priority Areas should not qualify for such consideration". Skond il-para 4.1 l-istess jidher li japplika fir-rigward ta' Relocated Fuel Stations (RFS).</p> <p>Is-suggeriment taghna f'dan ir-rigward huwa s-segwenti:</p> <ol style="list-style-type: none"> 1. Huwa minnu li hemm diversi kunsiderazzjoni, partikolarment ta' natura ambjentali, li jinfluwenzaw id-decizjoni dwar fejn ghandhom jigi rilokati pompi qodma jew fejn ghandhom jinhargu l-permessi ghal pompi godda u li f'dan ir-rigward operaturi bhalna ghandhom jinghataw preferenza ghar-rilokazzjoni proprju ghaliex kif inghad hawn fuq prezentement ahna ma nistghux noperaw in vista tal-progett ta' Bieb il-Belt li effettivament wassal ghad-demolizzjoni tal-pompa taghna. Imma certament ukoll li l-kriterji indikati hawn fuq ma jaghmlux enfazi bizzejjed fuq il-punt kardinali ghal tali allokkazzjoni u cioe' li, fi kwalunkwe kaz, fl-interess tal-konsumatur u kif ukoll ta' min ikun qed ihaddem tali pompi, ghandhom jigu indikati siti f'zoni arterjali tal-gzejjer Maltin u Ghawdxin sabiex fihom ikunu jistghu joperaw tali pompi u/jew li 	<ol style="list-style-type: none"> 1. Mhix l-intenzjoni ta' din il-policy li tindika siti partikolari minhabba li dan jista jippromwovi sitwazzjoni ta' oligopolju. Li wiehed ghandu jfittex sit li aqeghed magenb Toroq Arterjali jew Distributorji huwa kkontemplat mill-policy.

Ref no	Name	Summary	Reply
		<p>applikazzjonijiet f'zoni bhal dawn ghandhom jigu ikkunsidrati favorevolment. Huwa inutli li s-siti indikati ikunu skond ma jinghad hawn fuq jekk imbaghad ma tinghatax kunsiderazzjoni ghall-fatt li sit tista' tghid m'ghandu l-ebda utilita' ghall-iskop ta' pompa jekk effettivament ma jkunx f'zona qrib hafna ta' triq principali jew arterjali f'Malta jew Ghawdex. Dan ikun ukoll in linea mal-proposta diga' maghmulha mill-istess GRTU u cioe' li l-pompi l-godda ghandhom imorru f'area fejn hemm il-htiega ghalihom skond il-ftehim tal-1997 bejn l-Enemalta u l-GRTU.</p> <p>2. Illi b'zieda ma' dak li jinghad hawn fuq nissugerixxu wkoll li l-Gvern jindika siti proprjeta' tieghu proprju qrib zoni arterjali liema siti jkunu kkunsidrati tajbin sabiex tigi stabilita jew rilokata pompa tal-petrol. Dan huwa wkoll in linea ma' dak suggerit mill-GRTU u cioe' li l-Gvern ghandu jara fejn jistghu jinstabu bicciet ta' art fejn jistghu jigu zviluppati bhala pompi tal-petrol bi prezz ta' art li jkun ragjonevoli u mhux kummercjali. B'hekk kull applikant prospettiv ikun jista' jittenderja liberament ghall-istess proprjeta' bl-intiza li l-proprjeta' in kwistjoni hija wahda tajba ghall-uzu bhala pompa.</p> <p>Ghandna nifhmu li s-suggerimenti maghmulin minna huma ghal kollox ragjonevoli u fl-interess tal-partijiet kollha koncernati. Kif jinghad hawn fuq napprezzaw jekk min-naha taghkom tinfirmawna b'data u hinijiet a konvenjenza taghkom sabiex inkunu nistghu niltaqghu maghkom jew ma' rapprezentanti taghkom wick imb' wicc biex nfissrulkom f'aktar dettall ic-cirkustanzi partikulari tal-kaz taghna u kif ukoll is-suggerimenti maghmulin minna hawn fuq.</p>	<p>2. Ara il-kumment precedenti.</p> <p>Il-Laagha mitluba kienet saret nhar l-4 ta' Gunju 2014.</p>

Ref no	Name	Summary	Reply
FSSP/2014/013-2	GRTU (Collective submission)	<p>Go Fuels: We would like to propose the below items to be discussed in the meeting with MEPA next Tuesday. Moreover I would like to confirm that we will be attending to this meeting, we will be 2 persons attending.</p> <ol style="list-style-type: none"> 1. Distance for the relocation of existent kerb side pumps from city centres to be extended to 500m, the suggested 200m is too close and still can create traffic problems when entering some of Malta and Gozo's urban city development zone. 2. Relocation of an existing petrol station may have a car wash since this will not create any development besides the required equipment to operate. The policy discriminates with approved permits given in the last 5 years which granted a garage, restaurants and car wash to a relocation of a kerbside pumb. 3. Sites for RFS or NUFs distance from groundwater source to be lowered to 100metres. Modern fuels station design as well as current MRA standards such as double wall pipe lines, double wall storage tanks and waterproof cess pits, already cater for the prevention of any leakages which might seep into the ground water source; being 5 metres or 300 meters will not make any difference. Once again this provision is discriminating with owners who would like to relocate under this new policy since MEPA already approved relocations which are literally next door to a bore hole, erected on agricultural land well outside the development zone. Such examples are Ta buqana station in Rabat, Malta and the new station to be constructed outside Mgarr, Malta. 	<p>Go Fuels: Indicated meeting has taken place on 4th. June 2014</p> <ol style="list-style-type: none"> 1. Distance from Development Zone Boundary increased from 200m to 500m. in Section 4.3 (b) x). 2. Sections 3.2 and 4.1 to 4.4 have been amended in the revised policy 3. The 300 m distance was established upon guidance from technical expertise with awareness of the facilities available to mitigate leakages and seepages.

Ref no	Name	Summary	Reply
		<p>Lourdes Service Station With regards to the meeting which is going to be held on 20/05/14, we would like to confirm that 2 persons from Lourdes Service Station will be attending.</p> <p>Also, we have the following suggestion points to put forward:</p> <p>a) Considering that the future of car manufacturers is based on investing in LPG and electric automobiles, we don't see the need to accept new permits for petrol stations. At least we should wait for the existing ones to be upgraded first.</p> <p>b) Point 5.4 of the Fuel Services Stations Policy document states that the distance between one petrol station and another should not be more than 500m. However, we believe that such distance should be at least 2 kilometres.</p> <p>JAV Service Station The following are some suggestions on the new policy for fuel stations.</p> <p>Ref. 5.4 : MEPA must consider that the distance from a NUFS or RFS must be at least not less than a radius of 1km from an Existing petrol Station, and not 500m. As they are suggesting.</p> <p>Ref. 6.2 : Simple Access Layout It is important that all corners of the entries and exists of all fuel stations must have a double yellow-line. Wardens and police must observe in different times during the day that these areas are always kept clear, and no vehicles are</p>	<p>Lourdes Service Station Public meeting held on date indicated.</p> <p>a) The policy is guided by the objectives in section 1.2 and takes into account a liberalised market situation.</p> <p>b) The 500m distance is judged to be a reasonable one especially taking into account the other policy considerations</p> <p>JAV Service Station</p> <p>Ref. 5.4 : The 500m distance is judged to be a reasonable one especially taking into account the other policy considerations</p> <p>Ref. 6.2 : Simple Access Layout The request was brought to the attention of the relevant authorities.</p>

Ref no	Name	Summary	Reply
		<p>parked in the entry or exit of a petrol station. Presently, this is causing lots of confusion in a big number of stations especially those situated in main roads.</p> <p>Ref. 6.6 : Ghost Islands Ghost Islands are really dangerous for the motorist. Vehicles must not cross the road to enter the fuel station. They must go and turn to the nearest roundabout. When stopping to turn, this is causing lots of traffic and accidents, because the opposite traffic rarely gives way to those crossing. Present ghost islands, must also be removed.</p> <p>When studying an application, MEPA must first insist on a re-allocation of an existing petrol station. These must be given a priority. While applications for new petrol stations must only be considered, only if the development is going to be in a totally new area where the community has a long way to access the first petrol station.</p> <p>Valletta Service Station Qeghdin niktbulkom in kwantu membri tal-GRTU u b'referenza ghac-cirkulari datata 8 ta' Mejju, 2014 permezz ta' liema intlabna sabiex nibghatu s-suggerimenti taghna qabel il-laqgħa ta' konsultazzjoni li ser tinzamm mill-MEPA rigward il-Policy il-gdida għall-Pompi tal-Petrol. Nixtiequ nigbdulkom l-attenzjoni għall-fatt li skond l-imsemmija 'policy paper' jingħad li għandhom jinsabu siti tajbin sabiex fihom ikunu jistghu jinbnew pompi godda jew ahjar rilokati l-kerbside pumps u f' dan ir-rigward paragrafu 3.2 isemmi:</p> <p>Designated Industrial Area Small and Medium Enterprise Sites Areas of Containment</p>	<p>Ref. 6.6 : Ghost Islands Ghost Islands are used worldwide and are deemed to operate satisfactorily provided that they are well designed. Additionally, each development planning application will be assessed for transportation safety by Transport Malta.</p> <p>Prioritisation of development application is an administrative matter and beyond the scope of this policy.</p> <p>Valletta Service Station Kummenti inizjali innotati.</p>

Ref no	Name	Summary	Reply
		<p>Open Storage sites identified in the Open Storage policy Other areas designated for development in a subsidiary plan for:</p> <p>(i) non-residential development; or (ii) planning designation or existing uses which do not contemplate a Social and Community facility or function and where in both cases MRA, CPD and TM deem it would be safe to locate a fuel station Sites already occupied by fuel stations</p> <p>Jinghad ukoll li "sites designated as Residential Areas or Residential Priority Areas should not qualify for such consideration". Skond il-para 4.1 l-istess jidher li japplika fir-rigward ta' Relocated Fuels Stations (RFS).</p> <p>Is-suggeriment taghna f'dan ir-rigward huwa s-segwentti: Huwa minnu li hemm diversi kunsiderazzjoni, partikolarment ta' natura ambjentali, li jinfluwenzaw id-decizjoni dwar fejn ghandhom jigi rilokati pompi qodma jew fejn ghandhom jinhargu l-permessi ghal pompi godda. Imma certament ukoll li l-kriterji indikati hawn fuq ma jaghmlux enfazi bizzejjed fuq il-punt kardinali ghal tali allokazzjoni u cioe' li, fi kwalunkwe kaz, fl-interess tal-konsumatur u kif ukoll ta' min ikun qed ihaddem tali pompi, ghandhom jigu indikati siti f'zoni arterjali tal-gzejjer Maltin u Ghawdxin sabiex fihom ikunu jstghu joperaw tali pompi. Huwa inutli li s-siti indikati ikunu skond ma jinghad hawn fuq jekk imbaghad ma tinghatax kunsiderazzjoni ghall-fatt li sit tista' tghid m'ghandu l-ebda utilita' ghall-iskop ta' pompa jekk effettivament ma jkunx f'zona qrib hafna ta' triq principali jew arterjali f'Malta jew Ghawdex. Dan ikun ukoll in linea mal-proposta diga' maghmulha mill-istess GRTU u cioe' li l-pompi l-godda ghandhom imorru f'area fejn hemm il-htiega ghalihom skond il-ftehim tal-1997 bejn l-Enemalta u l-GRTU. Illi b'zieda ma' dak li</p>	<p>Mhix l-intenzjoni ta' din il-policy li tindika siti partikolari. Li wiehed ghandu jfittex sit li qieghed magenb Triq Arterjali jew Distributorja huwa kkontemplat mill-policy.</p>

Ref no	Name	Summary	Reply
		<p>jinghad hawn fuq nissugerixxu wkoll li l-GRTU tinsisti sabiex fejn il-Gvern jindika siti proprjeta' tieghu proprju qrib zoni arterjali liema siti jkunu kkunsidrati tajbin sabiex tigi stabilita jew rilokata pompa tal-petrol. Dan huwa wkoll in linea ma' dak minnkomm suggerit u cioe' li l-Gvern ghandu jara fejn jistghu jinstabu bicciet ta' art fejn jistghu jigu zviluppati bhala pompi tal-petrol bi prezz ta' art li jkun ragjonevoli u mhux kummercjali.</p> <p>Naghmlu referenza ghall-proposta numru 8 maghmulha wkoll mill-GRTU u cioe' li dawk il-pompi li ilhom dormant ghal izjed minn sentejn ghandhom jispiccalhom il-permess darba ghal dejjem. Da parti taghna assolutament ma naqblux ma' din il-proposta u dan ghaliex jekk din il-proposta tigi implementata tkun qed issir ingustozzja kbira fil-konfront ta' dawk l-operaturi li mhux qed joperaw il-pompi taghhom mhux ghax ma jistghux imma ghaliex ic-cirkostanzi wassluhom li ma jistghux jibqghu joperaw il-pompa taghhom jew jaghmlu uzu mil-licenzja relattiva. Fil-kaz taghna, rigwardanti il-pompa tal-petrol li kienet tinsab f' Bieb il-Belt, wara li l-Gvern iddemolixxa l-pompa sabiex jaghmel spazju ghall-progett ta' Bieb il-Belt minghajr ma offra l-ebda kumpens u minghajr ma offrilna l-ebda sit alternattiv, ahna gejna f' sitwazzjoni li ma nistghux noperaw proprju ghaliex m'hemmx siti individwati ghall-uzu fejn hu tajjeb biex tinbena pompa w ghalkemm kien u ghad hawn postijiet tajbin il-mepa ghanda struzzjonijiet li siti li jkunu saru applikazzjonijiet fuqhom u gew rifjutati anke jekk isiru applikazzjonijiet f'dan ir-rigward jistghu jergghu jigghu michuda ghalkemm kien hemm fejn saru b'indhil politiku u bil-barka taha stess. Tkun saret ingustizzja assurda mill-Union taghna stess jekk, wara li ilna nistennew il-hrug ta' din il-'policy' sabiex nkunu nistghu nergaw nibdew noperaw, issa il-permess ikun jista' jigi terminat ghax 'dormant' ghal izjed minn sentejn – minghajr ma ssir investigazzjoni ta' x'wassal li tali permess ikun 'dormant'</p>	<p>Dan huwa punt amministrattiv li l-ahjar li jigi indirizzat huwa f'fora ohrajn.</p>

Ref no	Name	Summary	Reply
		<p>u/jew tal-kumpens dovut lill-operatur f'dak il-kaz. Ninnotaw ukoll li f'dan il-kaz jehtieg illi l-GRTU ticcara l-posizzjoni taghha f'dan ir-rigward sabiex ma ssirx ingustizzja akbar fil-konfront taghna u ta' operaturi ohrajn li jistghu jghaddu mill-istess problema bhal taghna.</p> <p>Autofill Fuel Station</p> <ol style="list-style-type: none"> 1. Every curbside petrol station should be considered as an individual case. One must take into consideration the fact that not all curbside petrol stations are in the same locality, thus every curbside station will have its own situation/effect on THAT particular locality. Also one must take into consideration the fact that not every petrol station operator is the owner of the land where the petrol station is situated, despite the fact that the petrol station permit is under his name. 2. One must also take into account the age of the operator. The expense required to undergo the whole upgrade process is quite substantial, and the owner needs to see if this is feasible enough for him especially if he is of a certain age, possibly retiring soon. Operators which are close to the retiring age should be given the benefit to continue operating without major changes/expenses. If the petrol station is then inherited or sold without doubt the petrol station has to be upgraded according to the new standards. 3. One might consider offering some form of help in particular to curbside petrol stations. As an example, I suggest that the government should offer with rent a suitable land for curbside petrol stations to relocate. The operator will invest on this adequate land instead of his current location. This will not only be beneficial in 	<p>Autofill Fuel Station</p> <ol style="list-style-type: none"> 1. The policy is not indicating a one size fits all direction for all fuel stations and context as well as the EPFS's details have a considerable bearing on an eventual development planning proposal assessment. 2. Presumably these considerations implicitly feature in the objectives indicated in Section 1.2 3. This suggestion was forwarded to the relevant authorities.

Ref no	Name	Summary	Reply
		<p>terms of keep up with the EU standards but also creating a better investment by having a more adequate land with the possibility of offering more services than a curbside fuel station.</p> <p>4. Science and technology are always evolving, and perhaps eventually electric/gas cars will be our future. Therefore one should ask if the investment we are going to make NOW is feasible enough for the NEAR FUTURE.</p>	<p>4. A scope of this policy is to be reasonably future proof as far as land allocation and the extent and nature of the operations are concerned. It is however no the remit of this policy to guide applicants on financial feasibility issues.</p>
FSSP/2014/014-2	Ms. Elizabeth Grech	<p>Lil min tikkoncerna, Nixtieq naghti l-proposti tieghi:</p> <p>1. Nahseb li d-distanza ghandha tizdied minn 200 metru ghall-600 metru 'l boghod mill-iskema tal-bini.</p> <p>2. Nahseb li pompi tal-Petrol reallokati jew godda ghandhom ikunu f'Toroq arterjali jew Bypass, ghalix minn hawn jghaddu hafna vetturi.</p> <p>3. Nissuggerixxi li ghandha tinghata prijorita lill-art li tkun proposta u mhux lil liema tip ta' licenzja s-Sid ikollu. Nistaqsi illi jekk sid ta' licenzja ezistenti jixtieq jaghmel reallokazzjoni u jkollu art Contained, jinghata permess mill-MEPA? Jew jaqbillu jinjora l-licenzja ezistenti li ghandu u japplika mal-MRA ghall-wahda gdida biex ikun jista' jikkwalifika ghall-permess ta' zvilupp mill-MEPA? U sid ta' bicca art ODZ, b' licenzja mill-godda, jinghata permess mill-MEPA? Dan ser isir biex jibqa' l-monopolju? La ahna membri tal-Unjoni Ewropeja, tikkunsidraw li persuna tista' tiehu lill-awtorita koncernata u l-Gvern l-Qorti jekk din l-awtorizzazzjoni tigi michuda?</p>	<p>1. I l-Distanza mit-tarf taz-Zoni ta' L-izvilupp giet emendata minn 200m ghal 500m. f'Sezzjoni 4.3 (b) x).</p> <p>2. Dan is-suggeriment huwa in-linja mas-Sezzjoni 5.2 u 5.3 tal-policy.</p> <p>3. Il-policy mhix qed tikkontempla monopolju, anzi tassumi suq liberalizzat. Fuq dan il-punt kien ukoll ittiehed parir legali waqt it-tfassil tal-policy.</p>

Ref no	Name	Summary	Reply
		<p>Dan il-punt qed nispejgah b'mod aktar semplici f' Diagram mehmuz ma' dan l-email. Nispera li din il-policy meta tidhol fis-sehh ma tohloqx ingustizzji.</p>	<p>Id-"diagram" jindika sitwazzjonijiet li potenzjalment jistaw minn naha taghhom johlqu ingustizzji</p>
<p>FSSP/2014/015-2</p>	<p>Dr. S.Farrugia Mosta Local Council</p>	<p>Within the locality of Mosta there are two kerb side petrol stations and two other petrol stations which though not exactly kerb side are situated within the residential area. All such petrol stations pose encumbrances within our locality:</p> <p>Health risks posed by the inhalation of fuel fumes, issues of safety arising from the potential for combustion of these stations, noise pollution and light pollution. Aesthetically these stations stick out like a sore thumb amongst the typical buildings of our village as the areas surrounding the station is often stained an unsightly black due to the fuel spillage.</p> <p>Furthermore the kerb side stations compound the problem of traffic congestion within Constitution Street particularly when the stations reservoir is being filled and on the weekends when there is more frequent use of the stations by clients.</p> <p>These petrol station owners should be provided with adequate support to relocate their petrol stations outside the centre of our locality whilst ensuring that no undue sacrifices are posed on our rural environment.</p>	<p>Noted</p> <p>The policy is mainly oriented towards the assessment of future development planning applications. Consultation with the Environmental Health Department has been added in para 8.9. Health and Safety related matters are indicated in Section 9.</p> <p>Section 2.2 refers to such situations.</p> <p>Objective 1.2 b) is oriented to this end. There are other measures that go further than planning policy that may be contemplated to this effect. This proposal has been forwarded to the relevant authorities.</p>

Ref no	Name	Summary	Reply
FSSP/2014/016-2	Perit Colin Zammit Maniera Group	<p>Reference is made to Paragraph 4.3 section 'x' relating to the distance that an RFS should not be more than 200m away from a development scheme boundary. In our humble opinion this distance is too low. Several of my clients want to remove an inconvenient existing station from a town or village core area and relocate outside the village as one exits onto a by pass or arterial road. From a case analysis a 500m distance would be much more appropriate and surely of less inconvenience to the neighbouring building scheme. We would appreciate if our observation is taken into consideration during the finalisation of the document.</p> <p>Otherwise I compliment you on the depth to which the policy has been studied and written.</p>	<p>Distance from Development Zone Boundary increased from 200m to 500m. in Section 4.3 (b) x).</p> <p>Remark appreciated</p>
FSSP/2014/017-2	Mr. Michael Stivala obo MDA	<p>The proposed policy discriminates between applications for relocation of existing petrol service stations in residential areas and completely new applications, allowing the possibility of petrol stations in ODZ area only for the former cases. The Malta Developers Association is against this discrimination as a matter of principle.</p> <p>The limitation of petrol station licences has already given rise to an artificial value tied with what is, after all, a licence by the state. This is already contra-indicated in a free market economy where all players – whether those established or potential should have a level playing field. The proposed discrimination will encourage an increase in the artificial value of existing fuel station licences and this cannot be tolerated. While MDA understands that the relocation of existing fuel stations from residential areas should be incentivised, it feels that this does not justify the proposed discrimination. In the circumstances, if MEPA</p>	<p>The policy given 10 locational options for all fuel stations plus a further 3 for relocated fuel stations. A limited positive “discrimination” was employed to encourage relocation from inappropriate sites. According the same opportunities to all proposals was not deemed to achieve this aim.</p> <p>There is no current limitation on fuel station licences as this sector operates within a liberalised market context. As made amply clear, no “right” to relocate is contemplated...actually MEPA is receiving a good number of applications to upgrade existing fuel stations so that they satisfy European standards. The planning gain suggestion is referred to the relevant authorities. It is however important to note that this argument can lead to counter-argument that this proposal would introduce another form of discrimination, this time on the qualifying EPFS.</p>

Ref no	Name	Summary	Reply
		<p>insists that this incentive should not simply consist of the 'right' to relocate fuel service stations from a residential area to an ODZ area as is being proposed, but it should be made clear that this is a concession that is given only for a time window of say three years. In this way, pressure is also brought upon fuel service stations in residential areas who would know that the possibility of relocation to an ODZ area is not an indefinite permanent policy that would result in an automatic increase in artificial value in the licence of such stations. We believe that in order to have an equal playing field MDA recommends that a planning gain will be charged for new petrol station in ODZ areas.</p>	
FSSP/2014/018-2	Perit Kylie Ann Borg Marks	<p>In my capacity as representative of a number of residents from Hal Tarxien, I have attended the public consultation meeting and wish to again stress the point that it is important that this new policy addresses very clearly, and covers, all potential expansion (not only upgrading) of any existing fuel service station and its ancillary facilities. By this, I would like to emphasize that expansion of such a development may not always include upgrading of an existing facility but it may easily consist of a spread of new facilities over agricultural or un-built land and thus there is an increase of various activities concentrated in one area. Such proposals may still have a negative effect on the everyday life of residents close by apart from any potential negative effects that these may have on the environment. May I suggest that the policy tackles such possible expansions, apart from tackling upgrades.</p>	<p>In this policy context, upgrading is intended to refer also to expansion of existing fuel stations. Refer to the amended TABLE 1 as well as revised Sections 3.2 and 4.1 to 4.4.</p>
FSSP/2014/019-2	Dr. Joe Smith La Rosa	<p>The undersigned makes reference to clause 4.3(b)x of the Public Consultation Document and proposes that the length of the 200 m from the nearest Development Zone boundary is too restrictive and should be increased to at least 600 m from 200 m.</p>	<p>Distance from Development Zone Boundary increased from 200m to 500m. in Section 4.3 (b) x).</p>

